

Objection Deadline: March 8, 2023

James I. Stang (admitted *pro hac vice*)
Iain A.W. Nasatir
John W. Lucas
Malhar S. Pagay (admitted *pro hac vice*)
Gillian N. Brown
PACHULSKI STANG ZIEHL & JONES LLP
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Counsel to the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	:
MADISON SQUARE BOYS & GIRLS CLUB, INC., ¹	: Case No. 22-10910-SHL
	:
Debtor.	:
	:
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**SEVENTH MONTHLY FEE STATEMENT OF
PACHULSKI STANG ZIEHL & JONES LLP FOR
COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM JANUARY 1, 2023 THROUGH JANUARY 31, 2023**

¹The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional:	Official Committee of Unsecured Creditors
Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 16, 2022
Period for which compensation and reimbursement is sought:	January 1, 2023 through January 31, 2023
Monthly Fees Incurred:	\$77,669.00
Fee Reduction:	(\$20,129.00) ²
Fees (After Reduction):	\$57,540.00
20% Holdback:	\$11,508.00
Total Fees Less 20% Holdback:	\$46,032.00
Monthly Expenses Incurred:	\$654.69
Total Fees and Expenses Due:	\$46,686.69
This is a <u> X </u> monthly <u> </u> interim <u> </u> final application	

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, the *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to*

² As disclosed in the Firm's employment application, the Firm is utilizing rates that are reduced from standard rates so that attorney time is capped at \$900 per hour and paralegal time is capped at \$400 per hour. The reduction set forth in this Fee Statement here accounts for the reduction from the following standard rates, as set forth in Exhibit A hereto: J. Stang (\$1,695); I. Nasatir (\$1,395); M. Pagay (\$1,295); J. Lucas (\$1,150); G. Brown (\$975); B. Dassa (\$545); and M. Matteo (\$495).

the Official Committee of Unsecured Creditors Effective as of July 16, 2022 [Docket No. 196] (the “PSZJ Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),³ Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”), hereby submits this monthly fee statement (the “Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Committee in this chapter 11 case (the “Case”) during the period January 1, 2023 to January 31, 2023 (the “Fee Period”).

By this Fee Statement, PSZJ seeks payment in the amount of \$46,686.69, comprised of the following: (i) \$46,032.00, which is eighty percent (80%) of the total amount of fees incurred for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of \$654.69, which is one hundred percent (100%) of actual and necessary expenses that PSZJ incurred in connection with its representation of the Committee during the Fee Period.

Services Rendered and Expenses Incurred

1. Attached as **Exhibit A** is a summary of PSZJ’s professionals by individual, setting forth the (i) name and title of each individual who provided services in connection with this chapter 11 case during the Fee Period, (ii) the year of bar admission for each PSZJ attorney, (iii) the current, standard hourly billing rate for each individual at PSZJ working on this chapter 11 case during the Fee Period, (iv) the capped hourly rate for those individuals, and (v) the total fees that each individual billed to this Case during the Fee Period at the applicable capped billing rate. The Committee hired PSZJ on the condition that the total fees incurred would be discounted to the extent the blended rate of PSZJ attorneys does not exceed \$900.00 per hour. All of the

³ Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

PSZJ attorneys who worked on this Case during the Fee Period have standard billing rates in excess of \$900.00 per hour. As provided in the PSZJ Retention Order, PSZJ paralegal hourly rates on this Case will not exceed \$400.00 per hour. All of the PSZJ paralegals who worked on this Case during the Fee Period have standard billing rates in excess of \$400.00 per hour. PSZJ is providing a reduction in attorney and paralegal fees for the Fee Period in the amount of \$20,129.00.

2. Attached as **Exhibit B** is a summary of the services PSZJ rendered during the Fee Period and the compensation it seeks, by project category.

3. Attached as **Exhibit C** is a summary of expenses that PSZJ incurred during the Fee Period and for which it seeks reimbursement.

4. Attached as **Exhibit D** is itemized time detail of PSZJ professionals during the Fee Period and summary materials related thereto.

Notice and Objection Procedures

5. Notice of this Fee Statement shall be given by U.S. Mail, or by email where available, upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Mr. Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Esq.; Andrew M. Parlen, Esq.; John T. Weber, Esq.; and Miriam Levi, Esq.); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz, Esq. and Tara Tiantian, Esq.) (the "**Notice Parties**").

6. Objections to this Fee Statement, if any, must be filed with the Court and served upon PSZJ and the other Notice Parties (set forth at para. 5, above) so as to be received no later than **March 8, 2023** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

7. If no Objections to this Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses set forth in this Fee Statement.

8. If an Objection to this Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. *See* Interim Compensation Order. To the extent such an Objection is not resolved between PSZJ and the party filing the Objection, the Objection shall be preserved and scheduled for consideration at the next interim fee application hearing.

Dated: February 21, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Gillian N. Brown

James I. Stang (admitted *pro hac vice*)

Iain A.W. Nasatir

John W. Lucas

Malhar S. Pagay (admitted *pro hac vice*)

Gillian N. Brown

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*Counsel to the Official Committee of Unsecured
Creditors*

EXHIBIT A

Compensation by Professional

**SUMMARY OF COMPENSATION BY PROFESSIONAL
FOR SERVICES RENDERED FOR THE PERIOD
JANUARY 1, 2023 – JANUARY 31, 2023**

Name of Professional Partners and Counsel	Title	Year Admitted	Standard Hourly Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
James I. Stang	Partner	1980	1,695.00	900.00	6.80	6,120.00
Iain A.W. Nasatir	Partner	1983	1,395.00	900.00	0.60	540.00
Malhar S. Pagay	Partner	1997	1,295.00	900.00	12.70	11,430.00
John W. Lucas	Partner	2005	1,150.00	900.00	33.70	30,330.00
Gillian N. Brown	Counsel	1999	975.00	900.00	9.20	8,280.00
Total Partners and Counsel:					63.00	56,700.00

Name of Paralegals and Other Non-Legal Staff	Standard Hourly Billing Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
Beth D. Dassa	545.00	400.00	1.90	80.00
Mike A. Matteo	495.00	400.00	0.20	760.00
Total Paralegals:			2.10	840.00

ALL PROFESSIONALS	DISCOUNTED/CAPPED BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Attorneys	900.00	63.00	56,700.00
Paralegals, Non-Legal Staff	400.00	2.10	840.00
Total Hours and Fees Incurred		65.10	57,540.00

EXHIBIT B

Compensation by Task Code

**AGGREGATE TIME SUMMARY BY TASK CODE
FOR THE PERIOD JANUARY 1, 2023 – JANUARY 31, 2023**

Task Code	Project Category	Total Hours	Total Fees (\$)
BL	Bankruptcy Litigation	1.60	1,740.00
CO	Claims Admin/Objections	0.20	195.00
CP	Compensation of Professionals	2.70	2,157.50
CPO	Compensation of Professionals/Other	0.20	195.00
GC	General Creditors Committee	16.70	20,923.50
H	Hearings	0.80	920.00
PD	Plan & Disclosure Statement	42.00	50,746.50
RPO	Retention of Professionals/Other	0.90	791.50
	TOTAL		\$77,669.00 less discount of \$20,129.00, for a total of \$57,540.00

EXHIBIT C

Expense Summary

**AGGREGATE ITEMIZED EXPENSES FOR THE PERIOD
JANUARY 1, 2023– JANUARY 31, 2023**

Expenses Category	Total Expenses (\$)
Federal Express	125.50
Outside Services	500.00
Pacer/Court Research	1.00
Postage	8.64
Reproduction Expense	9.30
Research	10.25
TOTAL	\$654.69

EXHIBIT D

Itemized Time Detail for the Fee Period

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

January 31, 2023

Invoice 131796

Client 54162

Matter 00004

GNB

GNB

RE: Committee Representaton

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2023

FEES \$77,669.00

EXPENSES \$654.69

LESS COURTESY DISCOUNT \$20,129.00

TOTAL CURRENT CHARGES **\$58,194.69**

BALANCE FORWARD **\$306,569.19**

TOTAL BALANCE DUE **\$364,763.88**

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BDD	Dassa, Beth D.	Paralegal	545.00	1.90	\$1,035.50
GNB	Brown, Gillian N.	Counsel	975.00	9.20	\$8,970.00
IAWN	Nasatir, Iain A. W.	Partner	1395.00	0.60	\$837.00
JIS	Stang, James I.	Partner	1695.00	6.80	\$11,526.00
JWL	Lucas, John W.	Partner	1150.00	33.70	\$38,755.00
MAM	Matteo, Mike A.	Paralegal	495.00	0.20	\$99.00
MSP	Pagay, Malhar S.	Partner	1295.00	12.70	\$16,446.50
				<hr/> 65.10	<hr/> \$77,669.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	1.60	\$1,740.00
CO	Claims Admin/Objections[B310]	0.20	\$195.00
CP	Compensation Prof. [B160]	2.70	\$2,157.50
CPO	Comp. of Prof./Others	0.20	\$195.00
GC	General Creditors Comm. [B150]	16.70	\$20,923.50
H	Hearings	0.80	\$920.00
PD	Plan & Disclosure Stmt. [B320]	42.00	\$50,746.50
RPO	Ret. of Prof./Other	0.90	\$791.50
		65.10	<hr/> \$77,669.00

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Federal Express [E108]	\$125.50
Outside Services	\$500.00
Pacer - Court Research	\$1.00
Postage [E108]	\$8.64
Reproduction Expense [E101]	\$9.30
Research [E106]	\$10.25
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	\$654.69

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
01/03/2023	GNB	BL	Email Jennifer Freeman and Jason Amala regarding The Charles Hayden Foundation.	0.10	975.00	\$97.50
01/03/2023	MSP	BL	Email exchange with J. Amala, et al. re: BGCA.	0.10	1295.00	\$129.50
01/04/2023	GNB	BL	Review email from Jennifer Freeman and revise draft declaration from The Charles Hayden Foundation in accordance therewith.	0.10	975.00	\$97.50
01/04/2023	GNB	BL	Draft email to Alan Kornberg regarding declaration from The Charles Hayden Foundation regarding Madison insurance.	0.10	975.00	\$97.50
01/25/2023	MAM	BL	Update virtual file regarding response from TIG Insurance to 2004 subpoena.	0.10	495.00	\$49.50
01/26/2023	IAWN	BL	Review Freeman email re insurance and respond to G. Brown re same	0.20	1395.00	\$279.00
01/26/2023	MSP	BL	Email exchange with J. Freeman, Gillian N. Brown, Iain Nasatir, et al. re: insurance information.	0.10	1295.00	\$129.50
01/27/2023	MSP	BL	Email exchange with John W. Lucas, Gillian N. Brown, et al. re: Insurance information.	0.10	1295.00	\$129.50
01/29/2023	MSP	BL	Email exchange with John W. Lucas, Gillian N. Brown, et al. re: insurance information.	0.10	1295.00	\$129.50
01/30/2023	MSP	BL	Email exchange with J. Amala, Gillian N. Brown, Iain Nasatir, J. Freeman, et al. re: insurance information.	0.20	1295.00	\$259.00
01/31/2023	GNB	BL	Email with Jason Amala regarding BGCA.	0.20	975.00	\$195.00
01/31/2023	GNB	BL	Email with Miriam Levi regarding The Hayden Foundation; Consider email from Jillian Dennehy regarding Rule 2004 discovery.	0.10	975.00	\$97.50
01/31/2023	MAM	BL	Update virtual file regarding 2004 Order for Boys & Girls Club of America.	0.10	495.00	\$49.50
				1.60		\$1,740.00

Claims Admin/Objections[B310]

01/03/2023	GNB	CO	Review emails from Linda Chen and Kathryn Tran regarding claim no. 60126; Email with Sophia Lee regarding same.	0.10	975.00	\$97.50
01/05/2023	GNB	CO	Review email from Kathryn Tran regarding claim	0.10	975.00	\$97.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
no. 60126; Email with Steven Gershowitz regarding same.				<u>0.20</u>		<u>\$195.00</u>
Compensation Prof. [B160]						
01/05/2023	GNB	CP	Prepare certificate of no objection to PSZJ's fifth monthly fee statement; Email Sophia Lee with filing and service instructions regarding same.	0.10	975.00	\$97.50
01/08/2023	GNB	CP	Email John W. Lucas regarding status of Debtor's payments to PSZJ in advance of January 12 fee application hearing.	0.10	975.00	\$97.50
01/08/2023	MSP	CP	Email exchange with Gillian N. Brown, et al. re: status of fee payments.	0.10	1295.00	\$129.50
01/09/2023	MSP	CP	Email exchange with J. Weber, John W. Lucas, Gillian N. Brown, et al. re: fee application issues.	0.20	1295.00	\$259.00
01/10/2023	MSP	CP	Email exchange with John W. Lucas, Gillian N. Brown, Beth Dassa, et al. re: compensation issues.	0.50	1295.00	\$647.50
01/11/2023	BDD	CP	Email G. Brown re itemization of expenses for fee applications.	0.10	545.00	\$54.50
01/17/2023	BDD	CP	Review tasks performed in preparation of PSZJ December fee statement (.20) and email G. Brown re same (.10).	0.30	545.00	\$163.50
01/18/2023	BDD	CP	Email G. Brown re PSZJ December monthly fee statement.	0.10	545.00	\$54.50
01/19/2023	BDD	CP	Prepare PSZJ December fee statement and emails G. Brown re same.	1.10	545.00	\$599.50
01/20/2023	BDD	CP	Email G. Brown re PSZJ December monthly fee statement.	0.10	545.00	\$54.50
				<u>2.70</u>		<u>\$2,157.50</u>
Comp. of Prof./Others						
01/03/2023	GNB	CPO	Email Tabish Rizvi, Michael Whalen, and Steven Landgraber regarding outstanding fees and expenses.	0.10	975.00	\$97.50
01/09/2023	GNB	CPO	Email with Dundon Advisers regarding monthly fee statements; Email with Beth D. Dassa regarding same.	0.10	975.00	\$97.50
				<u>0.20</u>		<u>\$195.00</u>

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General Creditors Comm. [B150]

01/03/2023	GNB	GC	Email with Jason Amala regarding Plan-related documentation.	0.10	975.00	\$97.50
01/03/2023	GNB	GC	Video conference call with state court counsel regarding Plan.	0.70	975.00	\$682.50
01/03/2023	MSP	GC	Email exchange with Gillian N. Brown, et al. re: State Court counsel meeting.	0.10	1295.00	\$129.50
01/03/2023	JWL	GC	Call with state court counsel regarding trustee and allocation (.7); call with R. Liquori regarding same (.3);	1.00	1150.00	\$1,150.00
01/04/2023	JWL	GC	Call with J. Scotto regarding case status (.2);	0.20	1150.00	\$230.00
01/05/2023	GNB	GC	Video conference Committee call re Settlement Trustee (partial attendance).	1.50	975.00	\$1,462.50
01/05/2023	JIS	GC	Call in to trustee interviews (partial attendance)	0.90	1695.00	\$1,525.50
01/05/2023	JWL	GC	Prepare for settlement trustee interviews (.5); attend settlement trustee interviews (2.2); follow up call with G. Novod regarding interviews (.2);	2.90	1150.00	\$3,335.00
01/06/2023	GNB	GC	Telephone conference with Malhar S. Pagay and John W. Lucas regarding Plan-related workflow.	0.70	975.00	\$682.50
01/06/2023	MSP	GC	Meeting with John W. Lucas and Gillian N. Brown re: open items and work streams.	0.70	1295.00	\$906.50
01/06/2023	JWL	GC	Call with G. Brown and M. Pagay regarding case work-streams (.7);	0.70	1150.00	\$805.00
01/09/2023	GNB	GC	Review Jason Amala and Gordon Novod emails regarding allocation under settlement trust in advance of today's state court counsel call.	0.10	975.00	\$97.50
01/09/2023	JIS	GC	Attend Committee call regarding plan issues.	1.10	1695.00	\$1,864.50
01/09/2023	JWL	GC	Prepare for weekly call with committee (.5); attend weekly call with committee and counsel regarding case status (1.1);	1.60	1150.00	\$1,840.00
01/11/2023	GNB	GC	Telephone conference with John W. Lucas regarding state court counsel call tomorrow and Committee minutes.	0.10	975.00	\$97.50
01/12/2023	GNB	GC	Attend state court counsel video conference call regarding Plan issues.	0.90	975.00	\$877.50
01/12/2023	JIS	GC	State court counsel call regarding open plan issues.	0.90	1695.00	\$1,525.50
01/12/2023	JIS	GC	Call J. Amala regarding case status.	0.30	1695.00	\$508.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/12/2023	MSP	GC	Review state court counsel meeting minutes.	0.10	1295.00	\$129.50
01/15/2023	GNB	GC	Finalize minutes from past two Committee meetings and circulate to attendees.	0.10	975.00	\$97.50
01/15/2023	MSP	GC	Review minutes of Committee and State Court Counsel meetings; email exchange with Gillian N. Brown, et al. re: same.	0.10	1295.00	\$129.50
01/18/2023	JIS	GC	(Partial) Attend state court counsel call regarding comments on reorganization plan.	1.10	1695.00	\$1,864.50
01/26/2023	GNB	GC	Consider email from Jennifer Freeman regarding insurance (.1); Email PSZJ team regarding same (.1).	0.20	975.00	\$195.00
01/26/2023	JWL	GC	Call with G. Daniello regarding case status (.6);	0.60	1150.00	\$690.00
				16.70		\$20,923.50

Hearings

01/12/2023	JWL	H	Attend Jan 12 hearing re exclusivity and first interim fees (.8);	0.80	1150.00	\$920.00
				0.80		\$920.00

Plan & Disclosure Stmt. [B320]

01/03/2023	GNB	PD	Email with John W. Lucas regarding Plan-related issues for immediate resolution.	0.10	975.00	\$97.50
01/03/2023	MSP	PD	Telephone call with John W. Lucas re: Navy Yard transaction, Plan and Disclosure Statement review.	0.40	1295.00	\$518.00
01/03/2023	MSP	PD	Email exchange with Jim Stang, John W. Lucas, Gillian N. Brown, Iain Nasatir re: revised disclosure statement, review of same.	0.20	1295.00	\$259.00
01/03/2023	MSP	PD	Email exchange with John W. Lucas, Gillian N. Brown, et al. re: Navy Yard, broker discussion, etc.	0.30	1295.00	\$388.50
01/03/2023	MSP	PD	Email exchange with John W. Lucas, J. Amala, et al. re: allocation and sharing protocol.	0.10	1295.00	\$129.50
01/03/2023	MSP	PD	Email exchange with John W. Lucas, Gillian N. Brown re: Plan deadlines.	0.10	1295.00	\$129.50
01/03/2023	MSP	PD	Email exchange with A. Kornberg, M. Levi, John W. Lucas, S. Landgraber, J. Weber, et al. re: discussion with Navy Yard broker.	0.30	1295.00	\$388.50

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54162 -00004

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January 31, 2023

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/03/2023	MSP	PD	Review claim treatment proposal (.3); email exchange with J. Amala, John W. Lucas, et al. re: same (.10).	0.40	1295.00	\$518.00
01/03/2023	JWL	PD	Email to liquidation trustee candidates for interviews (.6); review and revise allocation protocol for the plan (1.1);	1.70	1150.00	\$1,955.00
01/04/2023	GNB	PD	Email Tabish Rizvi regarding information for presentation to Committee tomorrow relating to Plan.	0.30	975.00	\$292.50
01/04/2023	GNB	PD	Email with John W. Lucas regarding Plan terminology; Review John W. Lucas emails to all settlement trustee candidates.	0.10	975.00	\$97.50
01/04/2023	JIS	PD	Call re status of plan, disclosure statement and interviews.	0.40	1695.00	\$678.00
01/04/2023	MSP	PD	Email exchange with John W. Lucas, et al. re: Liquidating Trustee.	0.20	1295.00	\$259.00
01/04/2023	MSP	PD	Email exchange with A. Kornberg, D. Lebenstein, et al. re: discussion with Navy Yard broker.	0.20	1295.00	\$259.00
01/04/2023	JWL	PD	Work on liquidating trustee interviews (.7); call with J. Weber regarding status of plan (.3); call with B. Michaelson regarding trustee interview (.5); call with Rock Creek regarding settlement trust interviews (.5);	2.00	1150.00	\$2,300.00
01/05/2023	JIS	PD	Call with J. Lucas regarding trustee interviews.	0.20	1695.00	\$339.00
01/05/2023	MSP	PD	Review objection to exclusivity extension motion.	0.20	1295.00	\$259.00
01/05/2023	MSP	PD	Email exchange with John W. Lucas, R. Liguori, et al. re: Liquidating Trustee.	0.10	1295.00	\$129.50
01/05/2023	MSP	PD	Email exchange with John W. Lucas, J. Amala, et al. re: claim allocation proposal.	0.10	1295.00	\$129.50
01/05/2023	MSP	PD	Email exchange with John W. Lucas, Gillian N. Brown re: Plan deadlines.	0.10	1295.00	\$129.50
01/05/2023	MSP	PD	Email exchange with John W. Lucas re: discussion with Navy Yard broker.	0.10	1295.00	\$129.50
01/06/2023	GNB	PD	Email with John W. Lucas regarding joinder to Debtor's reply to second motion for exclusivity.	0.10	975.00	\$97.50
01/06/2023	MSP	PD	Email exchange with John W. Lucas, Gillian N. Brown re: Navy Yard and other issues.	0.10	1295.00	\$129.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/06/2023	JWL	PD	Review and revise propose allocation distribution protocol (1.0); review and revise debtor's reply to Rockefeller exclusivity objection (1.0); call with S. Gershowitz regarding plan issues (.3); call with R. Liquori regarding plan distribution issues (.3);	2.60	1150.00	\$2,990.00
01/09/2023	MSP	PD	Email exchange with John W. Lucas re: exclusivity motion.	0.10	1295.00	\$129.50
01/09/2023	MSP	PD	Email exchange with John W. Lucas, J. Amala, G. Novod, James I. Stang, et al. re: claim allocation proposal.	0.20	1295.00	\$259.00
01/09/2023	MSP	PD	Email exchange with S. Landgraber, John W. Lucas, J. Weber, et al. re: Navy Yard broker, Cushman & Wakefield etc.	0.20	1295.00	\$259.00
01/09/2023	MSP	PD	Email exchange with John W. Lucas, M. Levi et al. re: exclusivity extension motion and order.	0.20	1295.00	\$259.00
01/09/2023	MSP	PD	Email with John W. Lucas re: Plan issues.	0.20	1295.00	\$259.00
01/09/2023	JWL	PD	Call with J. Weber regarding Rockefeller exclusivity objection and next steps (.3); call with Rock Creek regarding trustee selection (.3); call with B. Michaelson regarding same (.2); email to Madison counsel regarding trustee selection and broker issues (.3);	1.10	1150.00	\$1,265.00
01/11/2023	MSP	PD	Attention to Navy Yard issues (.3); email exchange with J. Weber, John W. Lucas, et al. re: same (.10).	0.40	1295.00	\$518.00
01/12/2023	JIS	PD	Review G. Novod memo regarding open plan issues.	0.40	1695.00	\$678.00
01/12/2023	MSP	PD	Email exchange with S. Landgraber, John W. Lucas re: Navy Yard provisions.	0.10	1295.00	\$129.50
01/12/2023	MSP	PD	Email exchange with J. Weber, John W. Lucas et al. re: resolution of exclusivity extension.	0.10	1295.00	\$129.50
01/12/2023	MSP	PD	Email with John W. Lucas re: incorporation of plan term sheet in plan.	0.10	1295.00	\$129.50
01/12/2023	MSP	PD	Email exchange with John W. Lucas, G. Novod, et al. re: pursuit of insurance, allocation etc, (.1); review revised proposed protocol (.20).	0.30	1295.00	\$388.50
01/12/2023	JWL	PD	Prepare for call with state court counsel regarding distribution allocation issues (.5); attend call regarding the same (.9); review and revise allocation protocol (1.1);	2.50	1150.00	\$2,875.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/13/2023	MSP	PD	Email exchange with John W. Lucas, J. Weber, et al. re: revisions to Plan.	0.10	1295.00	\$129.50
01/14/2023	MSP	PD	Email exchange with John W. Lucas, M. Levi, et al. re: Committee comments on Plan.	0.10	1295.00	\$129.50
01/16/2023	JIS	PD	Email J. Lucas re update on case status, including allocation meetings.	0.10	1695.00	\$169.50
01/16/2023	MSP	PD	Email exchange with John W. Lucas, et al. re: meeting to discuss allocation.	0.10	1295.00	\$129.50
01/17/2023	MSP	PD	Email exchange with John W. Lucas et al. re: meeting to discuss allocation.	0.10	1295.00	\$129.50
01/18/2023	GNB	PD	Analyze information for survivor trust.	0.20	975.00	\$195.00
01/18/2023	GNB	PD	Two telephone conferences (.1 and .2) with Sophia Lee regarding analysis of claims for allocation protocol.	0.30	975.00	\$292.50
01/18/2023	GNB	PD	Review proof of claim for allocation protocol.	0.10	975.00	\$97.50
01/18/2023	GNB	PD	Attend video conference call with state court counsel regarding survivor trust (partial attendance).	1.60	975.00	\$1,560.00
01/18/2023	GNB	PD	Email with John W. Lucas regarding allocation protocol.	0.10	975.00	\$97.50
01/18/2023	MSP	PD	Telephone call with John W. Lucas re: pending plan issues, etc.	0.20	1295.00	\$259.00
01/18/2023	MSP	PD	Review exclusivity extension order.	0.10	1295.00	\$129.50
01/18/2023	MSP	PD	Attention to claims and distribution issues, protocol, etc. (.3); email exchange with Gillian N. Brown, John W. Lucas, et al. re: same (.10).	0.40	1295.00	\$518.00
01/18/2023	JWL	PD	Call with G. Galardi regarding settlement (.5); call with M. Pagay regarding revising plan (.2); review and revise plan (1.0); prepare for (.5) and have call with counsel to committee members regarding allocation (2.0); revise allocation protocol for abuse class (.6);	4.80	1150.00	\$5,520.00
01/19/2023	MSP	PD	Email exchange with John W. Lucas, Committee members re: distribution protocol.	0.10	1295.00	\$129.50
01/19/2023	JWL	PD	Call with A. Kornberg regarding plan (.4);	0.40	1150.00	\$460.00
01/20/2023	IAWN	PD	Review language for plan	0.20	1395.00	\$279.00
01/20/2023	IAWN	PD	Telephone call with J. Lucas re plan	0.10	1395.00	\$139.50

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01/20/2023	JIS	PD	Committee call regarding allocation protocol.	1.40	1695.00	\$2,373.00
01/20/2023	JWL	PD	Call with committee and counsel regarding distribution protocol (1.4); call with S. Gershowitz re same (.5); revise plan re committee changes (2.1);	4.00	1150.00	\$4,600.00
01/22/2023	JWL	PD	Review and revise plan per term sheet and allocation protocol (2.2);	2.20	1150.00	\$2,530.00
01/23/2023	MSP	PD	Email with John W. Lucas re: review of Plan and Disclosure Statement.	0.60	1295.00	\$777.00
01/24/2023	MSP	PD	Email exchange with John W. Lucas re: review of disclosure statement.	0.10	1295.00	\$129.50
01/24/2023	MSP	PD	Review Plan draft.	2.80	1295.00	\$3,626.00
01/24/2023	JWL	PD	Call with J. Weber regarding plan (.5); review and revise solicitation motion (2.0);	2.50	1150.00	\$2,875.00
01/27/2023	MSP	PD	Email exchange with James I. Stang, John W. Lucas, Iain Nasatir, Gillian N. Brown re: Debtor's revised Plan.	0.30	1295.00	\$388.50
01/27/2023	MSP	PD	Review revised Plan (.3); email exchange with M. Levi, John W. Lucas, Iain Nasatir, et al. re: same (.10).	0.40	1295.00	\$518.00
01/27/2023	JWL	PD	Initial review of Debtor's changes to plan (.5);	0.50	1150.00	\$575.00
01/30/2023	IAWN	PD	Exchange emails with J. Lucas re federal check	0.10	1395.00	\$139.50
01/30/2023	MSP	PD	Email exchange with John W. Lucas, Iain Nasatir, et al. re: disposition of insurance reimbursement check.	0.10	1295.00	\$129.50
01/30/2023	JWL	PD	Email with J. Stang regarding plan status (.4); call with J. Weber regarding same (.3);	0.70	1150.00	\$805.00
01/31/2023	JWL	PD	Call with S. Gershowitz regarding plan issues (.6); call with G. Novod regarding plan issues (.3);	0.90	1150.00	\$1,035.00
				42.00		\$50,746.50

Ret. of Prof./Other

01/03/2023	GNB	RPO	Review Andrea Schwartz's edits to Debtor's proposed order on application to employ Epiq pursuant to Section 327(a); Email with Miriam Levi regarding same.	0.10	975.00	\$97.50
01/04/2023	GNB	RPO	Draft email to Liza Ebanks regarding outstanding	0.40	975.00	\$390.00

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			application to employ Dundon Advisers LLC (.2); Email with PSZJ regarding UST no objection signature line (.1); Email Andrea B. Schwartz and Tara Tiantian regarding same (.1).			
01/04/2023	GNB	RPO	Email Matthew Dundon, Tabish Rizvi, and Matthew Whalen regarding status of Dundon Advisers LLC's employment application.	0.10	975.00	\$97.50
01/04/2023	BDD	RPO	Revisions to Dundon proposed retention order and emails G. Brown re same.	0.20	545.00	\$109.00
01/08/2023	GNB	RPO	Review order granting Dundon Advisers' employment application; Email Dundon Advisers regarding same; Email Andrea Schwartz and Tara Tiantian regarding same.	0.10	975.00	\$97.50
				<hr/> 0.90		<hr/> \$791.50
TOTAL SERVICES FOR THIS MATTER:						\$77,669.00

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Expenses

09/30/2022	RS	Research [E106] PA SOS Corp Document, L. Forrester	6.00
10/13/2022	RS	Research [E106] Insdta, Inv. ce3e01, Century Indemnity Fin for IAWN, L. Forrester	4.25
01/06/2023	FE	54162.00004 FedEx Charges for 01-06-23	24.86
01/06/2023	FE	54162.00004 FedEx Charges for 01-06-23	24.86
01/06/2023	RE	(11 @0.10 PER PG)	1.10
01/10/2023	FE	54162.00004 FedEx Charges for 01-10-23	25.33
01/10/2023	FE	54162.00004 FedEx Charges for 01-10-23	25.33
01/20/2023	FE	54162.00004 FedEx Charges for 01-20-23	25.12
01/20/2023	PO	LA Postage Charges	8.64
01/20/2023	RE	(82 @0.10 PER PG)	8.20
01/31/2023	OS	Everlaw, Inv. 73701, Madison database for the month of January 2023	500.00
01/31/2023	PAC	Pacer - Court Research	1.00

Total Expenses for this Matter

\$654.69

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 01/31/2023

Total Fees \$77,669.00

Total Expenses 654.69

Less Courtesy Discount \$20,129.00

Total Due on Current Invoice \$58,194.69

Outstanding Balance from prior invoices as of 01/31/2023 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
130635	07/31/2022	\$127,920.00	\$291.19	\$35,817.60
130861	08/31/2022	\$198,760.00	\$4,027.47	\$55,652.80
131167	09/30/2022	\$134,060.00	\$1,599.53	\$37,536.80
131231	10/31/2022	\$173,320.00	\$3,451.38	\$48,529.60
131456	11/30/2022	\$124,590.00	\$4,111.19	\$34,090.00
131587	12/31/2022	\$94,200.00	\$742.39	\$94,942.39

Total Amount Due on Current and Prior Invoices: \$364,763.88